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*Attorneys for Defendants
TikTok Inc. and ByteDance Inc.*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

BERNADINE GRIFFITH et al.,

Plaintiffs,

v.

TIKTOK, INC., et al.,

Defendants.

Case No.: 5:23-cv-00964-SB-E

**DECLARATION OF YUNFENG
WEI ISO JOINT STIPULATION**

Judge: Hon. Stanley Blumenfeld, Jr.
Action Filed: May 26, 2023
Trial Date: September 30, 2024

1 I, Yunfeng Wei, declare as follows:

2 1. I am a Tech Lead Manager and work with the TikTok Pixel as part of
3 my regular job responsibilities. I have personal knowledge of the facts described
4 below, and if called as a witness, I could and would testify competently thereto.

5 2. I was asked to capture all the non-TikTok user data collected,
6 generated, and processed from November 30, 2023. This is not something we
7 normally do, nor do we have a preexisting query to isolate such data. I created a
8 special query to extract from the database all types of unmatched data TikTok may
9 have regardless of how it may be categorized or described. The result was
10 voluminous and had to be separated into three spreadsheets.

11 3. The spreadsheets contain the data that we extracted from TikTok's
12 database without modification. None of the data was manipulated, excluded (other
13 than matched TikTok user data), altered, or redacted. I did not change the
14 unmatched data to "Null" "0" or delete data as part of the collection. No devices
15 were intentionally excluded or omitted from the data set. And "custom events"
16 data was not intentionally excluded or omitted from the data set.

17 4. Because this task is not part of our normal business operations, I did
18 not review or quality check the results to perform any validation, data integrity, or
19 any other review. I understand some concerns have been raised about "Null," "0,"
20 and empty values, whether the data reflects custom events, and whether it covers
21 all devices. To address these concerns, I have rewritten another query to
22 investigate and capture any data that may have been missed.

23 5. TikTok has certain data processes that run automatically. I also
24 designed special queries to access the unprocessed data so it could also be provided
25 in its "raw" format.

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1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct to the best of my knowledge.

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5 Executed this 12th day of February 2024.

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By: 卫云风 *Yunfeng Wei*
Yunfeng Wei

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